From: Rand Crafts
To: Aaron Nissen; Blaine Ipson; Brook Pace; James Nelson; Jerry Hintze
Date: Monday, June 02, 2003 4:27 PM
Subject: OverFire Air

I understand that another round of testing and OFA tuning will be taking place again this week. I have spoken with Aaron regarding specific testing parameters, but I though I would formalize them here.

Specifically, I have two issues I need addressed with this testing. First is any net increases to meet WEPCO for NOx. This entails a pre-construction test (complete), then three post-construction tests - One test at 875 MW (adjusted to heat rate) with no overfire air, and with NOx rate of 0.430 #/mmbtu; then another at 950 MW with no overfire air, with a NOx rate of 0.406 #/mmbtu; followed by another at 950 MW at 0.406 #/mmbtu NOx rate, but utilizing OFA in balance with higher O2.

Secondly, I need to have a relationship curve between CO, NOx, and O2 at various OFA settings with sufficient data to support derivation of CO concentrations based upon the other parameters during normal operation. As we have discussed before, testing should encompass these ranges as necessary.

Recall that the original Notice of Intent was written based upon previous test results and a vendor guarantee. CO impacts to air quality was modeling accordingly. At present, the DAQ is indicating that the NOI information will be used to determine a short term limit that will be placed as an operating condition in the new permit. Since this is a full fledged PSD permit, the DAQ feels that short term limits are required. (We disagree, as current BACT permit limits for CO have mostly been based on a 30 day rolling average.)

The DAQ is proposing a 1 hour limit of 0.3 #/mmbtu, and an 8 hour limit of 0.07 #/mmbtu (which needs to be changed as this is only the proposed increase). They have not determined whether to approach a 30 day rolling limit (which is what we would prefer, I'm sure). BACT for 30 dra for CO has been 0.11 to 0.15 #/mmbtu (about 100 ppm).